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6 Attorneys for **Linda Livolsi**

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 vs.
13 LINDA LIVOLSI and
14 WILLIAM LIVOLSI, JR.,
15 Defendants.

2:10-cr-578-APG-GWF

STIPULATION TO CONTINUE
SENTENCING HEARING

(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
17 States Attorney, and J. Gregory Damm, Assistant United States Attorney, counsel for the United
18 States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant
19 Federal Public Defender, counsel for LINDA LIVOLSI, and C. Stanley Hunterton, counsel for
20 William Livolsi, Jr., that the sentencing hearing currently set for Wednesday, February 18, 2015 at
21 10:00 am & 10:30 a.m., respectively, be vacated and reset to a date and time convenient to the court,
22 no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. That defendants are not in custody, live out of state and are in agreement with the
25 continuance.
26 2. The parties are in the process of gathering additional records and mitigation
27 information essential to the accurate preparation of the pre-sentence investigation report.
28

1 3. Counsel for Linda Livolsi is also awaiting additional medical records.

2 4. The parties agree to the continuance.

3 5. The additional time requested herein is not sought for purposes of delay, but merely
4 to allow for a resetting to accommodate the necessary preparations for sentencing and disposition.

5 6. This is the first request to continue the sentencing hearing filed herein.


6 DATED January 14, 2015

7 RENE L. VALLADARES
8 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

9 By: /s/ Monique Kirtley
10 MONIQUE KIRTLEY
11 Assistant Federal Public Defender
12 Counsel for Linda Livolsi

By: /s/ Gregory Damm
J. GREGORY DAMM
Assistant United States Attorney
Counsel for Plaintiff

13 By: 
14 C. STANLEY JUNTERTON
15 Counsel for William Livolsi, Jr.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:10-cr-578-APG-GWF

Plaintiff,

ORDER

vs.

LINDA LIVOLSI,

Defendant.

FINDINGS OF FACTS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

ORDER

IT IS THEREFORE ORDERED that the sentencing hearing currently set for Wednesday, February 18, 2015 at 10:00 am & 10:30 a.m., respectively, be vacated and continued to April 21, 2015 at 10:30 a.m., Courtroom 6C _____ for defendant Linda Livolsi and 11:00 a.m. for defendant William Livolsi Jr.

DATED this 20th day of January, 2015.


UNITED STATES DISTRICT JUDGE